



THE HUMANE SOCIETY
OF THE UNITED STATES

Testimony in Opposition to SB 210

Senate Agriculture Committee

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The Humane Society of the United States

On behalf of The Humane Society of the United States and our 370,000 members and supporters who live in Michigan, thank you for the opportunity to submit testimony in opposition to SB 210. This legislation would exempt facilities accredited by the Zoological Association of America (ZAA) from captive wildlife laws and regulations. ZAA is a very small and fairly new organization that formed in 2005, and should not be confused with the Association of Zoos and Aquariums (AZA), an organization founded in 1924 that has a long history of setting industry standards for zoological institutions. We urge you to reject SB 210, which would set a dangerous precedent of allowing substandard ZAA-accredited facilities to operate without any state oversight.

An exemption for the ZAA severely weakens laws and regulations intended to restrict the private possession of exotic animals to only **qualified** facilities. The AZA should be the only accrediting organization whose members meet a definition of a zoo in laws and regulations. Big cats and bears have very complex needs and when kept in captivity by unqualified individuals and facilities we often find unhealthy animals suffering from a variety of neurotic behaviors. Rampant and careless breeding has resulted in very large numbers of unwanted big cats and bears with very few options for appropriate placement.

The ZAA supports the private ownership of exotic pets and the commercialization of wildlife, which is contrary to the purpose of the Large Carnivore Act. A number of ZAA-accredited facilities are nothing more than privately-run menageries that breed and sell exotic animals, furthering the pet trade and contributing to the problem of unqualified individuals possessing dangerous wild animals. By contrast, in recognition of the negative conservation and welfare impacts of certain private uses of wildlife, the AZA recognizes that wild animals do not make good pets.

Accreditation should be a stringent process that ensures facilities provide humane care, exceptional husbandry, and safe conditions that greatly exceed the minimum standards of the federal Animal Welfare Act. The ZAA's caging and husbandry standards fall far short of what zoo professionals consider appropriate and are based on the very minimal standards developed by the Florida Fish and Wildlife Commission—a state that has the highest number of deaths and injuries by captive big cats, bears, primates, and elephants than any other state in the country.

For example, the ZAA requires a mere 240-square-feet, and only 8 feet of vertical height, to house a single chimpanzee. In comparison, the AZA mandates indoor and outdoor space of at least 2,000-square-feet and useable vertical heights of over 20 feet.

The ZAA accreditation application is a simple 3-page document that requires the candidate to provide basic contact information as well as very minimal information about the facility's animals, physical site, and programs. Conversely, each candidate for AZA accreditation must complete a 21-page application

which requires detailed information about the facility's animals, veterinary care, physical facilities, safety and security, conservation, education, research, governing authority, staff and finances, and also requires copies of the facility's policies, procedures, records, lists, and reports.

The AZA's more comprehensive application and accreditation process takes many months to complete, thereby ensuring that only qualified individuals and facilities are eligible for accreditation.

For accreditation, the AZA assembles a team of inspectors – including at least one veterinarian as well as animal and operations experts to visit the facility. The team spends several days visiting every area, interviewing staff, checking records, and examining the physical facilities and the animals. For ZAA accreditation, the organization sends only a two-member inspection team to separately evaluate the facility. One team member may be a local veterinarian chosen by the applicant.

Of special concern is the ZAA's lack of guidelines to properly address safety and security issues regarding exotic animals. The AZA has very detailed guidelines that cover zoonotic disease, emergency procedures (including when an animal attacks or escapes), safety in public access and service areas, risk management, handling of dangerous animals, security personnel training, and the use of firearms. The ZAA has very few guidelines, and in many cases none at all, pertaining to these safety-related categories for facilities housing dangerous animals.

Further, the ZAA specifically allows its members to facilitate public contact with exotic animals, despite the fact that such contact may run afoul of the Animal Welfare Act standards and is known to pose a safety risk to the public.

Of the 41 states that currently ban or require permits for the private ownership of exotic animals, nearly all recognize that ZAA-accreditation is insufficient to qualify for an exemption.

HSUS applauds Michigan for passing the Large Carnivore Act and we urge the committee to reject any attempts to weaken this important legislation, which would severely compromise animal welfare and pose tremendous risk to the public.

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